



Kelly Purcaro, Partner  
One Riverfront Plaza  
1037 Raymond Blvd., Suite 900  
Newark, New Jersey 07102  
Phone: 732.494.4800  
Fax: 954.333.4222  
Direct Phone: 732.456.8734  
Direct Fax: 732.957.2298  
Email: kelly.purcaro@gmlaw.com

June 3, 2025

**BY ECF**

Honorable Harvey Bartle III, U.S.D.J.  
United States District Court for the  
Eastern District of Pennsylvania  
16614 U.S. Courthouse  
601 Market Street  
Philadelphia, Pennsylvania 19106

**Re: *Atlas Data Privacy Corp., et al v. The Alesco Group, LLC et al* (No. 1:24-cv-05656-HB)  
– Joinder in Defendants’ Consolidated Motion to Dismiss Plaintiffs’ Complaint**

Dear Judge Bartle:

This firm represents the defendant The Alesco Group, LLC (“Defendant”) in the above-referenced matter. We write to advise the Court that Defendant joins the Consolidated Motion to Dismiss Reply Brief, which was filed under Dkt. No. 72 in the action captioned as *Atlas Data Privacy Corp. v. DM Group Inc.*, Case No. 24-cv-04075-HB. For the reasons set forth in the opening brief as well as the reply on the Consolidated Motion to Dismiss, Defendant respectfully requests that the Court grant the Motion and dismiss Plaintiffs’ Complaint in this matter with prejudice.

Respectfully submitted,

A handwritten signature in blue ink that reads "Kelly B. Purcaro".

KELLY PURCARO